

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

SEP 15 2017

CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

WILLIAM LEWIS WEAVER II

Defendant.

) Criminal No. 17-MJ-425

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Sarah Thaden, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. Your Affiant is a Special Agent with the Federal Bureau of Investigation ("FBI") and has been so employed since approximately March 2016. I am assigned to the Washington Field Office, Northern Virginia Violent Crimes Task Force. Prior to being hired as a Special Agent with the FBI, I was a police officer with the Charlottesville Police Department and was so employed from approximately July 2011 to February 2016.

2. I am a graduate of the FBI Basic Field Training Course in Quantico, Virginia, and the Basic Law Enforcement Training Course at the Central Shenandoah Criminal Justice Training Academy in Weyers Cave, Virginia. I have received formal training in the investigation of violent crimes, including specialized training in forensic evidence collection. I have received training regarding computer crimes and have participated in the execution of search warrants involving electronic evidence. I have a graduate degree in Linguistics, focusing on Forensic and Sociolinguistics. I have investigated or assisted in the investigation of a number

of cases involving violent criminal activity and crimes against persons and property. I have been a sworn law enforcement officer during all times herein.

3. The facts and information contained in this affidavit are based upon my training and experience, participation in federal investigations, personal knowledge, and observations during the course of this investigation, as well as the observations of other agents involved in this investigation. All observations not personally made by me were related to me by the individuals who made them or were conveyed to me by my review of records, documents, and other physical evidence obtained during the course of this investigation. This Affidavit contains information necessary to support probable cause and is not intended to include each and every fact and matter observed by me or known to the Government.

4. This Affidavit is submitted in support of a criminal complaint charging WILLIAM LEWIS WEAVER, II with transmitting, in interstate commerce, communications containing threats to injure another person, in violation of Title 18, U.S. Code, Section 875(c). As set forth in greater detail below, based on my investigation there is probable cause to believe that WEAVER transmitted, in interstate commerce, communications containing threats to injure the person of another, specifically Federal Agents of the Central Intelligence Agency (“CIA”) and Department of State, as well as local law enforcement officers.

PROBABLE CAUSE

5. According to information received from City of Herndon Police Department, law enforcement officers have visited WEAVER at his residence in Herndon, Virginia, which is within the Eastern District of Virginia, on at least two occasions prior to September 14, 2017, as a result of postings on Twitter (or “tweets”) associated with the Twitter handle @WillWeaver2. A review of @WillWeaver2’s Twitter page, which is publically accessible, indicates that the

account is based in "NOVA in VA." The Twitter page provides a link to a website with the domain name "william-weaver.com."

6. Records received from CIA's police department, which has law enforcement authority with respect to its facilities, indicate that on or before June 17, 2017, @WillWeaver2 posted at least one tweet that was directed at the CIA and the National Security Agency. The communication(s) was/were concerning in nature and resulted in the City of Herndon Police Department conducting a welfare check of WEAVER at his residence in Herndon, Virginia. During this meeting, WEAVER did not deny that he owns or controls @WillWeaver2, indicated that he had been intoxicated when he posted the tweet(s) in question, and did not intend to hurt anyone unless they came to his house.

7. According to the U.S. Department of State, on or about February 15, 2016, WEAVER submitted a passport application to the State Department. Then, approximately a year later, on or about February 6, 2017, WEAVER submitted another passport application to the State Department. The State Department has indicated that both applications were denied.

8. A review of the tweets posted on @WillWeaver2's Twitter page indicate that on or about August 29, 2017, @WillWeaver2 posted the following tweet regarding the CIA: "Logic continues to dictate that bombing the cia , and shotgunning them as they lineup outside the gate at work in the morn is my conclusion." Later on the same day, @WillWeaver2 posted another tweet that, given its context, also appeared to concern the CIA: "They all line up at those gates like ducks at the county fair shooting gallery, haha.All that evil just a few shotgun blasts away from gone."

9. Also, I have seen a tweet by @WillWeaver2 that was posted on or about August 29, 2017, and appears to have been directed at the State Department. It read as follows:

“@StateDept You have about 2 weeks 2 get my passport 2 me before the devices set off and the shotgun blasts start. Tick-tock goes the clock.” I know that @StateDept is the official Twitter account handle for the U.S. State Department.

10. On or about September 14, 2017, law enforcement officers with the City of Herndon Police Department and FBI Task Force Officers, one of whom is a Diplomatic Security Special Agent for the Department of State, made contact with WEAVER at his place of residence located in Herndon, Virginia. The purpose of the contact was to explain to WEAVER that the prior issue with his application for a passport was believed to have been resolved and he could attempt to apply again. During this meeting, WEAVER was made aware that the Task Force Officer who was present at the door of the residence was a federal agent. WEAVER made several statements of note during this encounter, including the following: something to the effect of “[I]t’s almost there. You are going to see;” “we are passed the courts;” and “I am on a set schedule for some events coming up that your folks should know about. I’m not who I once was.”

11. My review of @WillWeaver2 indicates that, on or about September 15, 2017, @WillWeaver2, whose location is listed as “NOVA in VA,” posted the following posts:

- a. “Police rolled up on my house at 9:30pm, banging on my door. Another @StateDept clown w/ them, but they seemed to have forgotten my passport.”
- b. “Talking about how I could pay them and shit all over again for my passport. Talking lies in front of the officer, again. Fake ass warrants.”
- c. “Now I warned you cocksucking assbags @StateDept to get me my shit that’s owned to me, yet you insult me by trying to strongarm me.”

d. "A reminder: To anyone who attempts to disarm me, or detain me, I will attempt to kill w/ all that is me and any of your nearby associates."

e. "So the cops roll up on my pad trying to intimidate me, and failed. So I just rolled up on their HQ and told them to back the fuck off."

12. According to City of Herndon Police Department, on or about September 15, 2017, WEAVER appeared in person at the City of Herndon Police Department and said something to the effect that he did not have any issues with them.

13. My review of @WillWeaver2 indicates that on or about September 15, 2017 the following tweets were posted:

a. "I don't care if you're cia, nsa, police, military, nutty christians. If u fuck with me, I will find you and skull fuck each & every 1 of you."

b. "And to clarify, when the police came over to start shot, they were antagonizing, flashlight in my eyes, making threats. I didn't back down."

c. "Today's going to be real interesting. I'm charged up, and have a lot of work to get to. Do not come to my house unless you're looking to die."

d. "It might be best to assume that all are enemies at this point."

14. Based on information received from a store located in Sterling, Virginia, which is within the Eastern District of Virginia, WEAVER went to the store in person on or about September 15, 2017, and attempted to purchase a shotgun and ammunition. WEAVER reportedly paid for the weapon and ammunition at that time but was told by employees that he was unable to take the weapon or ammunition home immediately. WEAVER reportedly advised that he would return on or about September 16, 2017, to retrieve the weapon and ammunition.

15. My review of @WillWeaver2 indicates on or about September 15, 2017, the following tweets were posted:

- a. "I tried to buy a shotgun for home defence. VA state police put it on delay. Can't trust police anymore. If denied Will get another way."
- b. "Talking to other nations to help me escape this now hellhole. We'll see, need gun first for protection."

16. Based on my training and experience, I know that tweets are posted on Twitter via an electronic device, such as a cellular telephone or computer, with an Internet connection. Based on information received from a representative of Twitter, I know that a tweet must be routed through one or more of Twitter's computer servers in order to be posted and that all of Twitter's computer servers are located outside of the state of Virginia. Accordingly, I submit there is reason to believe that the tweets identified above were transmitted in interstate commerce.

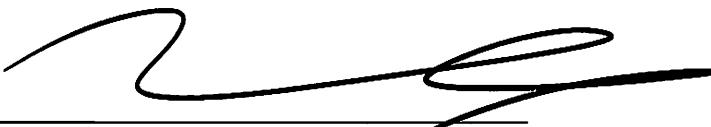
CONCLUSION

17. In sum, based upon the facts set forth in this affidavit, I submit that there is probable cause to believe that WILLIAM LEWIS WEAVER II did transmit, in interstate commerce, communications which contained threats to injure the person of another, specifically Federal Agents of the Central Intelligence Agency and Department of State, as well as local law enforcement officers, all in violation of Title 18, U.S. Code, Section 875(c).

/s/ Sarah Thaden

Sarah Thaden
Special Agent, FBI

Sworn and subscribed to before me on the 15th day of September, 2017


The Honorable Michael S. Nachmanoff
United States Magistrate Judge